

1 BRENDAN CRUZ KEITH, State Bar No. 108425
2 Lawyer
3 1965 Market Street, 2nd Floor
4 San Francisco, California 94103
5 Tel: (415) 626-6494
6 Fax: (415) 626-9835

7 Attorney for Movant,
8 Benjamin Rojas

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In Re: ARMANDO CASTRO SALGADO AND DORA BELTRAN SALGADO, Debtors,) CHAPTER 7 PROCEEDINGS
BENJAMIN ROJAS, Movant,) Case No. 12-32980
v. ARMANDO CASTRO SALGADO AND DORA BELTRAN SALGADO, AND THE UNITED STATES TRUSTEE, Respondents.) Assigned for all purposes to:
Hon. Hannah L. Blumenstiel
NOTICE OF MOTION FOR ORDER OF ABANDONMENT PURSUANT TO OR IN THE ALTERNATIVE FOR AN ORDER AUTHORIZING SALE OF REAL PROPERTY UNDER 11 USC § 554 OR 11 USC § 363
Hearing date: January 16, 2014
Time: 10:00 a.m.
Courtroom: 23

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION, ALL PARTIES AND COUNSEL OF RECORD:

1 PLEASE TAKE NOTICE that on January 16, 2014, at 10:00 a.m., or as soon thereafter as
2 counsel may be heard in Courtroom 23 of the above-referenced Court, located at 235 Pine Street, San
3 Francisco, CA 94104, Movant, BEN ROJAS, will and hereby moves this Court, for an order granting an
4 order of abandonment or in the alternative for an order authorizing the sale of the real property located at
5 at 347 Precita Avenue, San Francisco, CA 94110, San Francisco, California.

6 This motion is based upon all of the documents, records, and evidence on file in the instant case,
7 together with the Notice of Motion, the Motion, Request for Judicial Notice and the Declaration of
8 Movant filed and served concurrently herewith, and such additional documents, records, evidence and
9 argument of counsel as may be presented.
10
11
12

13 Dated: January 2, 2014

14 /s/ Brenda Cruz Keith
15 BRENDA CRUZ KEITH,
16 Attorney for Movant
17 BENJAMIN ROJAS
18
19
20
21
22
23
24
25
26
27
28